

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
CHRISTOPHER ROMANO

NO. 17-11765 ELF
CHAPTER 13

MOTION OF CAB EAST, LLC/FORD MOTOR CREDIT COMPANY, LLC
FOR ALLOWANCE OF ADMINISTRATIVE CLAIM 11 SC §503(b)(1)

1. Movant is CAB East, LLC by Ford Motor Credit Company, LLC ("Ford Credit"), the former owner and lessor of a 2016 Ford Escape motor vehicle (VIN...UB42944) ("Vehicle") leased by Debtor, pursuant to a 36 month Motor Vehicle Lease dated November 28, 2015 ("Lease") (Exhibit A also includes the Movant's Title to the Vehicle).

2. The Debtor's confirmed plan assumed the Lease, as did a Stipulation approved by the Court (Exhibit B) [Doc. 41 and 42].

3. Ford Credit ultimately obtained relief from the stay by Court order dated June 7, 2018 [Doc. 54], and the vehicle was recovered and sold.

4. Upon return of the Vehicle, there was a balance due on the Lease and Vehicle itself for which Debtor is liable. In addition there were over mileage and damage charges as set forth in Exhibit C charges, totaling \$3,363.00

5. Liability under the assumed Lease is an administrative expense of the Estate and the amount should be paid through the Chapter 13 Plan.

WHEREFORE, CAB East, LLC/Ford Motor Credit Company, LLC prays this Honorable Court to allow \$3,363.00, as an administrative expense, the same to be paid through the Chapter 13 Plan as such, and for such other relief as is just and equitable.

GERSHMAN LAW OFFICES, PC

/s/ Howard Gershman



Howard Gershman
610 York Road, Suite 200
Jenkintown, PA 19046
Tel: 215.886.1120
Fax: 215.886.1118